



MIRANDA SLONE SKLARIN VERVENIOTIS LLP

MICHAEL A. MIRANDA*
STEVEN VERVENIOTIS
ONDINE SLONE
RICHARD S. SKLARIN^o
MAURIZIO SAVOIARDO
ANDREW B. KAUFMAN[±]
LAWRENCE S. WASSERMAN*

THE ESPOSITO BUILDING
240 MINEOLA BOULEVARD
MINEOLA, NY 11501
TEL (516) 741-7676
FAX (516) 741-9060

WWW.MSSSV.COM

SENIOR COUNSEL
LOUISE FASANO
ANNE P. EDELMAN
ABRAHAM WARMBRAND
LAURA ALTO

ASSOCIATES
GABRIELLA CAMPIGLIA
RICHARD B. EPSTEIN
CHRISTOPHER J. LAMPERT*
BRANDON H. DORMAN
MICHAEL R. SEIDON
ANDRÉ S. HAYNES

*ALSO ADMITTED IN NEW JERSEY
oALSO ADMITTED IN FLORIDA
±ALSO ADMITTED IN DISTRICT OF COLUMBIA
oRESIDENT IN WESTCHESTER

BRANCH OFFICES:
WESTCHESTER, NY
NEW YORK, NY
WOODBIDGE, NJ

WRITER'S E-MAIL:
SVVERVENIOTIS@MSSSV.COM

WRITER'S DIRECT DIAL:
(516) 741-8488

December 13, 2022

Magistrate Judge Peggy Kuo
United States District Court
Eastern District of New York
225 Cadman Plaza East
Courtroom 11C South
Brooklyn, New York 11201

Re: Falls Lake v. Kalnitech Construction Corp. et. al.
Docket No: 1:22-cv-01473-KAM-PK
Our File No: 19-208

Dear Judge Kuo,

We represent the plaintiff, Falls Lake National Insurance Company ("Falls Lake"), in this action. I write today, with consent of all parties, to ask for an extension of the deadline for completion of discovery and to notify the court that the parties intend to file dispositive motions as was set in Your Honor's Scheduling Order (Doc. No. 35). The present deadline is this Friday.

I have today communicated with counsel, Jonathan Dachs, who will be filing an appearance for defendant Espinoza, who is the plaintiff in the underlying action, and then we will proceed with discovery with that party as well. As to the other parties, have exchanged some document discovery but that discovery is not completed and we have not conducted depositions, to the extended necessary in this case.

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The Court also had recently cancelled a settlement conference given the absence of counsel for Mr. Espinoza. We hope to be able to revisit settlement after we complete discovery or to seek leave to file dispositive motions after completion of discovery.

Accordingly, we request that the court grant a 60 day requested extension for the parties to complete discovery and to notify the Court as to each sides' intent to file a motion for summary judgment, request a pre-motion conference and/or submit a briefing schedule.

Respectfully submitted,
MIRANDA SLONE SKLARIN VERVENIOTIS LLP

s/Steven Verveniotis

Steven Verveniotis

cc: All Counsel Via ECF